

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

X CORP., a Nevada corporation,

Plaintiff,

v.

MEDIA MATTERS FOR AMERICA, a Washington, D.C. non-profit corporation, and ERIC HANANOKI,

Defendants.

Case No. 4:23-CV-1175 (RCO)

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**STIPULATION AND [PROPOSED] ORDER FOR THE EXTENSION OF TIME TO RESPOND TO COMPLAINT**

**WHEREAS**, Plaintiff X Corp. filed a summons and complaint (collectively, the “Complaint”) in the above-captioned matter on November 20, 2023, naming as defendants Media Matters for America and Eric Hananoki (collectively, “Defendants”);

**WHEREAS**, Plaintiff has served the Complaint on Defendants;

**WHEREAS**, Defendants’ deadline for responding to the Complaint is currently January 2, 2024;

**WHEREAS**, the parties have mutually agreed to an extension of Defendants’ deadline to respond to the Complaint to and including February 6, 2024;

**WHEREAS**, this is Defendants’ first request to extend the time to move, answer, or otherwise respond to the Complaint; and

**WHEREAS**, Defendants reserve all objections to the Complaint and waive none;

**NOW THEREFORE**, it is hereby stipulated and agreed, subject to the approval of the Court, that Defendants have until and including February 6, 2024 to move, answer, or otherwise respond to the Complaint in the above-captioned matter.

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\**Pro hac vice forthcoming*

*Attorneys for Defendants Media Matters for America & Eric Hananoki*

SO ORDERED:

Dated: \_\_\_\_\_

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The Honorable Reed C. O'Connor  
United States District Court Judge